

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELVIN ERB, on behalf of himself)
and all others similarly situated,)
)
Plaintiff,)
)
v.)
)
AWB LIMITED and AWB (U.S.A.))
LIMITED)
)
Defendants.)
)

Civil Action No. 1:07-CV-3880-GEL

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

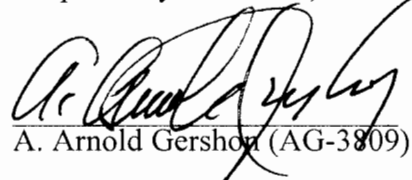
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, A. Arnold Gershon, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Chad Allen Carder
Barrack, Rodos & Bacine
3300 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-0600
Facsimile: (215) 963-0838

Chad Allen Carder is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of New Jersey. There are no pending disciplinary proceedings against Chad Allen Carder in any State or Federal Court.

New York, New York
Dated: June 27, 2007

Respectfully submitted,


A. Arnold Gershon (AG-3809)

BARRACK, RODOS & BACINE
1350 Broadway, Suite 1001
New York, NY 10018
Telephone: (212) 688-0782

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Civil Action No. 1:07-CV-3880-GEL

**AFFIDAVIT OF A. ARNOLD
GERSHON IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE**

State of New York)
) ss.:
County of New York)

A. Arnold Gershon, being duly sworn, hereby deposes and says as follows:

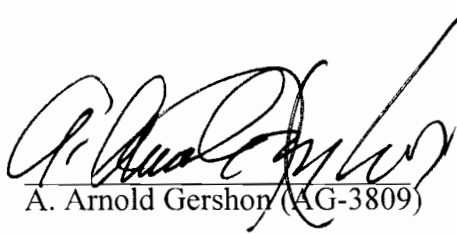
1. I am a partner at Barrack, Rodos & Bacine, counsel for Plaintiff Melvin Erb in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Chad Allen Carder as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1966. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
3. I have known Chad Allen Carder since 2006.
4. Chad Allen Carder is an associate with Barrack, Rodos & Bacine in Philadelphia, Pennsylvania.
5. I have found Chad Allen Carder to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Chad Allen Carder, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Chad Allen Carder, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Chad Allen Carder, pro hac vice, to represent Plaintiff Melvin Erb in the above captioned matter, be granted.

Sworn to before me
this 27 day of June 2007


NOTARY PUBLIC

B. JENNIFER JAFFEE
Notary Public, State of New York
No. 02JA4743961
Qualified in New York County
Commission Expires Aug. 1, 2011


A. Arnold Gershon (AG-3809)



Supreme Court of Pennsylvania

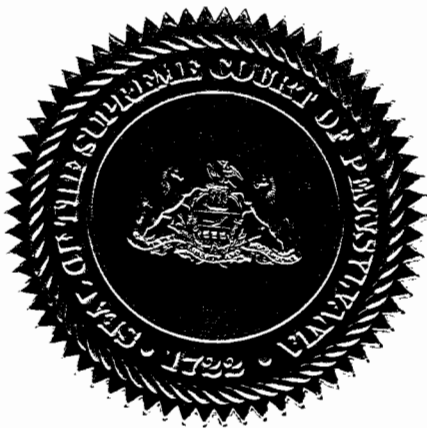
CERTIFICATE OF GOOD STANDING

Chad Allen Carder, Esq.

DATE OF ADMISSION

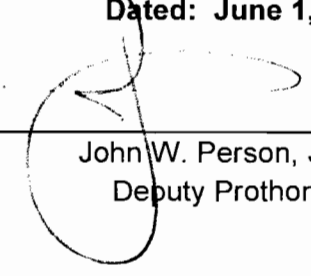
November 7, 2002

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: June 1, 2007



John W. Person, Jr., Esq.
Deputy Prothonotary

Supreme Court of New Jersey

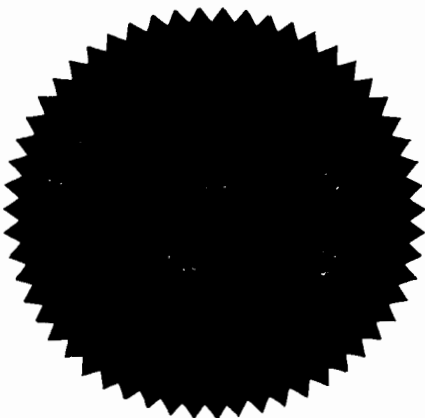


Certificate of Good Standing

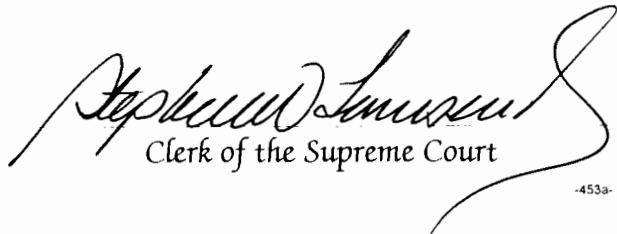
This is to certify that **CHAD ALLEN CARDER**
(No. **027092002**) was constituted and appointed an Attorney at Law of New
Jersey on **December 20, 2002** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
31ST day of **May**, 20 **07**


Clerk of the Supreme Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELVIN ERB, on behalf of himself)	
and all others similarly situated,)	Civil Action No. 1:07-CV-3880-GEL
)	
Plaintiff,)	
)	ORDER FOR ADMISSION
)	PRO HAC VICE ON WRITTEN
v.)	MOTION
)	
AWB LIMITED and AWB (U.S.A.))	
LIMITED)	
)	
Defendants.)	
)	

Upon the motion of A. Arnold Gershon, attorney for Plaintiff Melvin Erb, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Chad Allen Carder
Barrack, Rodos & Bacine
3300 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-0600
Facsimile: (215) 963-0838
Email: ccarder@barrack.com

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

UNITED STATES DISTRICT JUDGE